

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KAREN FUNDERBURK, on behalf of herself)
and all others similarly situated,)
Plaintiff,)
v.)
THE WIRBICKI LAW GROUP, LLC, and)
BANK OF AMERICA, N.A., as successor)
by merger to BAC Home Loans Servicing, LP,)
Defendants.)
No. 13-CV-04848
Magistrate Judge Kim (consent filed)

PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL

Plaintiff Karen Funderburk, by and through her attorneys, hereby files this request for preliminary approval of the parties' Class Action Settlement Agreement and states as follows:

1. All parties have now executed a Settlement Agreement, reached after multiple months of negotiations and substantial give-and-take.
2. The Settlement Agreement, and its respective exhibits, is attached as Exhibit 1 hereto.
3. In accordance with the terms of the Settlement Agreement, Plaintiff hereby requests that a Preliminary Approval Order be entered, the proposed Settlement Classes be certified for settlement purposes, and the Class Notice plan be approved for distribution.
4. A memorandum in support of this motion is being contemporaneously filed herewith.

WHEREFORE, Plaintiff respectfully requests that this Court preliminarily approve the parties' Class Action Settlement Agreement (Exhibit C to Exhibit 1) and set a date for a Final Fairness Hearing ninety (90) days from entry of the Preliminary Approval Order.

Respectfully submitted,

By: /s/ Stacy M. Bardo
One of Plaintiff's Attorneys

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